

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL INSURANCE COMPANY,)	
)	
Plaintiff,)	Case No. 08 C 2128
)	
v.)	
)	Judge Mathew F. Kennelly
QUINCY BIOSCIENCE, LLC and MARY)	
ANN RIKSCHEIM,)	Magistrate Judge Nolan
)	
Defendants.)	

**DEFENDANT QUINCY BIOSCIENCE, LLC'S AGREED MOTION
FOR AN ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE
PLEAD TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant Quincy Bioscience, LLC ("Quincy" or "Defendant"), by its attorneys, Ice Miller LLP, and pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, moves the Court for an enlargement of the time to answer or otherwise plead. In support of its Motion, Quincy states as follows:

1. As reported to the Court at the status hearing on Thursday, June 12, 2008, the parties in the underlying case to this insurance coverage case are currently engaged in settlement negotiations. If the underlying case settles and is dismissed, then this case will likewise be dismissed. In light of these facts, the Court continued the initial status conference for the case to July 8, 2008 at 9:00 a.m.

2. Currently, Defendant's responsive pleading is due on June 16, 2008.

3. Defendants would like an extension to answer or otherwise plead to Plaintiff's Complaint pending the settlement discussions, and therefore respectfully requests to and until July 8, 2008 to file its responsive pleading.

4. Counsel for Quincy spoke to counsel for Plaintiff and counsel for Plaintiff has no objection to an enlargement of time for Quincy to file a responsive pleading to Plaintiff's Amended Complaint to and until July 8, 2008.

5. No prejudice to any party will result from granting Quincy's Motion.

FOR THE FOREGOING REASONS, Defendant Quincy Bioscience, LLC respectfully requests that the Court grant it until July 8, 2008 to answer or otherwise plead to Plaintiff's Amended Complaint.

QUINCY BIOSCIENCE, LLC

By: /s/ Joan G. Ritchey
One of Its Attorneys

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